

EXHIBIT A

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

MILLENNIUM TGA, INC.,

Plaintiff,

v.

JOHN DOE,

Defendant.

CASE NO. 4:11-cv-4501

Judge: Honorable Judge Vanessa D. Gilmore

**DECLARATION OF DOUGLAS M. MCINTYRE IN SUPPORT OF PLAINTIFF'S
UNOPPOSED MOTION FOR EXTENSION OF 26(F) JOINT DISCOVERY
CONFERENCE**

I, Douglas M. McIntyre, declare as follows:

1. I am an attorney at law licensed to practice in Texas, and admitted in the Southern District of Texas. My business address is 720 North Post Oak Road, Suite 610, Houston, Texas 77024. I am counsel of record for Plaintiff in this matter.

2. Within a week of the Court granting Plaintiff's discovery motion on February 9, 2012, Plaintiff issued subpoenas on the relevant Internet Service Providers.

3. Internet Service Providers ("ISPs") AT&T Internet Services, Comcast Cable Communications ("Comcast"), Cebridge d/b/a Suddenlink Communications, Verizon Online, Comporium Communication and Telnet Worldwide sent letters to Plaintiff objecting to the subpoenas Plaintiff issued. These ISPs have not provided Plaintiff with the information it sought in the issued subpoenas.

4. Plaintiff filed a motion to compel Comcast's compliance with Plaintiff's subpoena in *Millennium TGA, Inc. v. John Doe*, No. 12-00150 (D.D.C. Mar. 7, 2012), ECF No. 1. Until the District of Columbia court rules on Plaintiff's motion, Comcast will not provide Plaintiff with the information it seeks.

5. Without the information Plaintiff seeks in its subpoenas, Plaintiff will be unable to identify, name and serve the defendant in this action. As a result, John Doe would be unaware of this action and would be unaware of any 26(f) Joint Discovery Conference that was scheduled prior to his or her identification.

6. I declare under penalty of perjury that the foregoing is true and correct based on my won personal knowledge, except for those matters stated on information and belief, and those matters I believe to be true. If call upon to testify, I can and will competently testify as set forth above.

DATED: March 12, 2012

BY: /s/ Douglas M. McIntyre